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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TRISH GILES

Plaintiff

vs.

**KAIER EMPLOYEE MEDICAL HEALTH
PLAN, KAIER PERMANENTE
SUPPLEMENTAL MEDICAL PLAN, and
KAIER FOUNDATION HEALTH PLAN,
INC.**

Defendants.

Case No.: 4:15-cv-3803-MEJ

| STIPULATION AND [PROPOSED]
| ORDER

WHEREAS the parties agree to provide defendants additional time to review the administrative record in this matter and prepare a response to the complaint on file.

AND WHEREAS defendants' response is presently due by prior stipulation tomorrow,
Thursday, January 21, 2016,

SO THEREFORE it is agreed that defendants' response shall be due on or before Thursday, February 4, 2016.

AND WHEREAS the Court has presently calendared a case management conference in this matter Thursday, January 28, 2016,

AND WHEREAS the parties believe that a case management conference will be more productive after defendants have filed their response to the complaint,

10 **SO THEREFORE** it is agreed that the case management conference will be continued from
11 Thursday January 28, 2016 at 10:00 a.m. to Thursday March 17, 2016 at 10:00 a.m.

13 | DATED: January 20, 2016

MARION'S INN LLP

By:

~~David M. Rosenberg-Wohl
Attorneys for Defendants~~

19 | DATED: January 20, 2016

BOLT KEENLEY KIM LLP

By:

Brian Kim
Attorneys for Plaintiff

1 **ACCORDINGLY, IT IS HEREBY ORDERED AS FOLLOWS:**

2 Defendants' response to the complaint is due to be filed on or before Thursday, February 4,
3 2016.

4 The case management conference set for Thursday January 28, 2016 at 10:00 a.m. is vacated
5 and continued to Thursday, March 17, 2016 at 10:00 a.m. The parties' CMCS is due in advance of
6 the new date.

7 Dated: January 20, 2016



PROOF OF SERVICE

I, the undersigned, state:

I am over the age of eighteen and not a party to this action. My business address is 1611 Telegraph Avenue, Suite 707, Oakland, California 94612-2145, which is located in Alameda County.

On January 20, 2016, I served the attached document(s):

STIPULATION AND [PROPOSED] ORDER

BY MAIL. I am familiar with the business practice at my place of business for collection and processing of correspondence for delivery by U.S. mail. Correspondence so collected and processed is placed in a sealed envelope, with postage fully prepaid, addressed to the recipient(s) listed below, and deposited in a mailbox that same day in the ordinary course of business.

BY E-MAIL. I am familiar with the business practice at my place of business for collection and processing of correspondence for delivery by electronic mail. Correspondence so collected and processed sent from an e-mail of an employee of this firm to the e-mail address(es) of the recipient(s) listed below.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: January 20, 2016

Jane Brooks